


Application granted. The conference is adjourned until September 8, 2022 at 11:00 a.m. Speedy Trial Time is excluded until then, per Counsel's email dated June 23, 2022. **SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

CAMILLE M. ABATE, ESQ.  
ATTORNEY AT LAW



Of Counsel, Nicholas Goodman & Associates  
333 Park Avenue South, Suite 3A, New York, NY 10010  
TEL: (212) 227-9003 • FAX: (212) 937-2112  
c.abate71@gmail.com

Dated: New York, New York  
June 27, 2022

June 23, 2022

**VIA EMAIL AND ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Patrick M. Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Request for Adjournment of Status Conference**  
***United States v. Frank Rios, 21 Cr. 610 (NRB)***

Dear Judge Buchwald:

I write to request an adjournment of the Status Conference currently scheduled for June 29, 2022. I ask that it be moved to September 7 or 8, whichever date is convenient to the Court.

The reason for this request is that it appears that the parties may have reached an agreement on a potential plea offer, which needs to be discussed further. However, I have no time this summer to discuss since I am preparing for a trial before the Hon. Judge Berman on July 11, and I have another trial scheduled before the Hon. Judge Hellerstein on August 15. I am then leaving the country until after Labor Day. I thus will have virtually no time to discuss the potential plea offer with my client and with the government.

I have spoken to AUSA Samuel Rothschild regarding this issue, and he advises me that the government has no objection to my request.

Thank you for your consideration of this matter.

Sincerely,

*Camille M. Abate*

Camille M. Abate, Esq.

cc: AUSA Samuel Rothschild (via ECF)